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13 Attorneys for Defendant ARISTA NETWORKS, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 CISCO SYSTEMS, INC.,

18 Plaintiff,

19 v.

20 ARISTA NETWORKS, INC.,

21 Defendant.

Case No. 5:14-cv-05344-BLF (NC)

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF REPLY
IN SUPPORT OF ARISTA'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**

Date: August 4, 2016
Time: 9:00 a.m.
Dept.: Courtroom 3 - 5th Floor
Judge: Hon. Beth Labson Freeman

Date Filed: December 5, 2014

Trial Date: November 21, 2016

1 I, Eduardo E. Santacana, declare:

2 1. I am an attorney licensed to practice law in the State of California and am an
3 associate with the law firm of Keker & Van Nest LLP, located at 633 Battery Street,
4 San Francisco, California 94111, counsel for Defendant Arista Networks, Inc. (“Arista”) in the
5 above-referenced action. Unless otherwise stated, the facts I set forth in this declaration are based
6 on my personal knowledge or knowledge I obtained through my review of corporate records or
7 other investigation. If called to testify as a witness, I could and would testify competently to such
8 facts under oath.

9 2. I submit this declaration in support of Arista’s Reply in Support of its Motion for
10 Partial Summary Judgment.

11 3. In opposing Arista’s motion for summary judgment, Cisco submitted documents
12 related to 45 of the 198 CLI commands on which Arista moved for partial summary judgment.
13 Of the remaining 153 commands for which Cisco submitted no evidence, Cisco’s response to
14 Arista’s Interrogatory 16 cited “Earliest Known Documents” that comprised 124 source code
15 files, 14 bug tracking requests and reports, 14 Cisco software versions or manuals, and 1 internal
16 functional specification.

17 4. Attached hereto as Exhibit A is a true and correct copy of a chart I prepared listing
18 the 198 commands on which Arista moved for partial summary judgment, divided into two
19 categories: the 153 commands for which Cisco submitted no evidence, and the 45 commands for
20 which Cisco submitted at least one document in opposition to summary judgment.

21 5. Attached hereto as Exhibit B is a true and correct copy of an excerpt of the IEEE
22 Standard for Local and Metropolitan Area Networks, Port-Based Network Access Control (IEEE
23 Std. 802.1X-2001, approved June 14, 2001. The IEEE standard is available on the IEEE’s

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1 website at <https://standards.ieee.org/findstds/standard/802.1X-2001.html>.

2
3 Executed July 21, 2016, at San Francisco, California.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct.

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EDUARDO E. SANTACANA